



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 17, 2020

7/20/2020

A status update is due by
July 27, 2020. SO
ORDERED.

By ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street, Courtroom 14C
New York, New York 10007

Re: *United States v. Joshua Adam Schulte, S3 17 Cr. 548 (PAC)*

Dear Judge Crotty:

As the Court is aware, on June 15, 2020, the defendant filed a request for records and papers used in connection with the constitution of the Master and Qualified Jury Wheels in this District. The defendant's motion is similar to motions that were made in other cases in this District. *See, e.g., United States v. Balde*, No. 20 Cr. 281 (KPF); *United States v. Williams*, No. 20 Cr. 286 (WHP); *United States v. Baker*, No. 20 Cr. 288 (LJL); *United States v. Henry*, No. 20 Cr. 293 (LJL). On June 30, 2020, pursuant to an order issued by Judge Failla, who is presiding over the *Balde* case, the Government and defense counsel involved in the affected cases, including this one, participated in a conference call with this District's Jury Administrator. After the call, the Government and the Federal Defenders of New York (the "Federal Defenders"), who are defense counsel in the *Balde* case and who also represent the defendant in this matter, agreed to meet and confer about any outstanding issues and submit a proposal to Judge Failla by July 14, 2020. At the July 1, 2020 arraignment in this case before the Court, the Court directed the Government to respond to the defendant's motion by July 17, 2020, after this proposal was submitted to Judge Failla.

On July 14, 2020, the Government submitted a letter to Judge Failla that outlined the areas of agreement between the Government and the Federal Defenders and the remaining open disputes. On July 16, 2020, Judge Failla issued an order resolving those disputes, which is attached hereto as **Exhibit A**. The Government believes that the agreement between the Government and the Federal Defenders and Judge Failla's order addresses the issues raised by the defendant's motion in this case as well, and believes the Court should adopt that order. The Government, however, asks for an opportunity to consult with defense counsel to determine whether there are any issues that the defense believes were not addressed by Judge Failla's order. The Government proposes

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that the parties would update the Court as to whether there are any remaining disputes on or before July 27, 2020.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

by: _____ /s/

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David W. Denton, Jr.
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cc: Defense Counsel (by ECF)